

Exhibit C (Redacted)



March 7, 2018

Via E-mail and Federal Express Overnight Mail

Gail Milon
Managing Vice President
Cambridge Capital Group
2120 Killarney Way
Suite 120
Tallahassee, FL 32309

Re: In re NFL Players' Concussion Injury Litigation, No. 12-md-2323-AB
Cambridge Entities' Productions in response to District Court's February 20, 2018
Order

Dear Ms. Milon:

I am sending this letter to you following our initial review of the documents produced by Cambridge Capital Group on behalf of the Cambridge Entities. Below, I detail our requests for explanations and additional productions. Depending upon your responses, I may have additional questions or identify the need for additional documents and information. As such, in order to be fully prepared for the April 2, 2018 hearing, I request that you respond to this letter by Wednesday, March 14, 2018. I intend to file this letter (in redacted form to protect Class Members' identities) along with my status report submission to the Court.

For the following Class Members, we are in receipt of documents from you, as contained in the Federal Express package with your cover letter, dated March 1, 2018, and as attachments to your two emails from Friday, March 2, 2018, reflecting multiple accounts for each Class Member, and many with multiple deposits (and some reductions), as reflected below:

[REDACTED] - \$79,950, \$220,000 (reduced by handwritten changes to \$170,000), \$137,000
[REDACTED] - \$23,761, \$320,000
[REDACTED] - \$15,000 (increased by handwritten changes to \$39,995), \$39,273.82
[REDACTED] - \$108,247, \$45,000
[REDACTED] - \$131,461.95 (increased to \$146,461.95), \$617,600 (increased to \$632,000)
[REDACTED] - \$165,000, \$527,386 (increased to \$662,886), \$40,000
[REDACTED] - \$16,907.44, \$89,995 (reduced to \$60,000)
[REDACTED] - \$140,937, \$195,000
[REDACTED] - \$336,453.14
[REDACTED] - \$316,059.98

As per your cover letter, you represent that included in the production are "Un Audited accounting documents of all funds (not just retirement funds) provided to Cambridge Entities by each Class Member." Please identify which are retirement funds and which are not, and indicate whether IRA monies have been comingled with other funds. Also advise as to whether an audit is in process,

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and if so, identify the nature of the audit, the person performing the audit, and when you expect it to be completed.

Additionally, for several of the “accountings,” handwritten changes have been made. For example, as to [REDACTED], a \$50,000 entry and corresponding total of \$220,000 was stricken and a new total of \$170,000 was handwritten. As another example, for [REDACTED], an entry reflecting a deposit of \$24,995 on 11/22/2016 was handwritten, along with a corresponding new total figure of \$39,995. Since these “accountings” are purportedly “As of February 28, 2018,” please explain why there are handwritten changes reflecting deposits from over a year ago. I need an explanation as to the reason for each handwritten notation, as well as which figures are accurate as of today – the handwritten or the typewritten figures.

Further, please clarify where the funds are being held, with whom they are invested, who controls the investments, and how the funds are invested. Some “accounting” documents reference both Millennium Trust (under the “Memo” column heading) and Bank of America (under the “Split” column heading). Please explain what is meant by “Split”. Also, explain why you have produced Millennium documents for the Class Members, but not Bank of America documents. Please produce any corresponding Bank of America documents.

Because we may be seeking documents directly from Millennium Trust Company, please provide the name and email address or telephone number of Cambridge’s contact at Millennium. If there are other financial institutions that are maintaining the Class Members’ IRA monies or non-retirement invested funds for Cambridge, please identify them and provide contact information.

Kindly confirm that the ten persons listed above are the only Class Members whose retirement funds were invested with Cambridge. We have information that others, including [REDACTED], may have retirement funds invested with Cambridge. Please double-check your files and let me know.

Finally, we do not view these “accountings” as sufficient in terms of complying with the Court’s directive in the February 20, 2018 Order requiring Cambridge to “produce complete accounting of all retirement funds provided to Cambridge Entities.” Some monies have been deposited for over two years. The balances on the accounts cannot simply be the amounts deposited. Please provide the current balance information, including the interest and/or the gains/losses from initial deposits, based upon the present value of each Class Member’s investment(s), and describe the nature of the investment(s). We also do not view these “accountings” as sufficient because, as noted above, where the funds are being held, with whom they are invested, who controls the investments, and how the funds are invested has not been provided.

In addition to providing what Cambridge purports to be accountings, you have also provided certain contracts and other documents signed by each Class Member in individual files. However, the documents that are noticeably absent from every file are the documents which are referenced in the Cambridge Capital Partners, L.P. Subscription Agreement and Power of Attorney, namely, (1) the Limited Partnership Agreement and (2) the Private Offering Memorandum (POM). Please produce

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those documents, and to the extent they changed over time, or were unique for each Class Member, please provide all versions.

Very truly yours,

Christopher A. Seeger
Co-Lead Class Counsel